

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

ContentGuard Holdings, Inc.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 2:13-cv-01112-JRG
	)	
Amazon.com, Inc.; Apple Inc.; BlackBerry,	)	
Limited (fka Research In Motion Limited) and	)	
BlackBerry Corporation (fka Research In	)	
Motion Corporation); HTC Corporation and	)	
HTC America, Inc.; Huawei Technologies Co.,	)	
Ltd. and Huawei Device USA, Inc.; Motorola	)	
Mobility LLC; Samsung Electronics Co., Ltd.,	)	
Samsung Electronics America, Inc., and	)	
Samsung Telecommunications America, LLC.,	)	
	)	
Defendants.	)	
	)	
and	)	
	)	
DIRECTV, LLC	)	
	)	
Intervener.	)	
	)	

**DEFENDANTS SAMSUNG ELECTRONICS CO., LTD., SAMSUNG ELECTRONICS  
AMERICA, INC. AND SAMSUNG TELECOMMUNICATIONS AMERICA, LLC'S  
NOTICE OF NON-OPPOSITION TO CONTENTGUARD HOLDINGS, INC. AND  
DIRECTV, LLC'S JOINT MOTION TO APPROVE STIPULATION (DKT. 319)**

On December 12, 2014, plaintiff ContentGuard Holdings, Inc. ("ContentGuard") and Intervener DIRECTV, LLC ("DIRECTV") jointly submitted a stipulation for approval by the Court regarding severance of the dispute between DIRECTV and ContentGuard. Dkt. 319. The stipulation provides, *inter alia*, that "[s]ubject to the Court's approval, all claims and counterclaims involving DIRECTV's technology, products, and/or services shall be severed into a separate case" and "[a]ll claims asserted by ContentGuard against DIRECTV's technology,

products, and/or services shall be prosecuted solely and directly against DIRECTV in the severed case, and all contentions of infringement involving DIRECTV technology, including products or services asserted by ContentGuard against Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Telecommunications America, LLC are hereby withdrawn in favor of the claims to be litigated in the severed case against DIRECTV.”

Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Telecommunications America, LLC<sup>1</sup> do not oppose the motion or stipulation.

Dated: February 2, 2015

Respectfully submitted,

By: /s/Neil P. Sirota (w/permission by  
Allen F. Gardner)

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<sup>1</sup> Effective January 1, 2015, Defendant Samsung Telecommunications, LLC (“STA”) was merged into Defendant Samsung Electronics America, Inc., and STA ceased to exist as a corporate entity. *See* D.I. 1116.

*Attorneys for Samsung Defendants*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on February 2, 2015.

/s/Allen F. Gardner